UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 23 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Ms. Carol Whitefield
President
Elite Coatings, Inc.
995 Waube Lane
Green Bay, Wisconsin 54304

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Elite Coatings, Inc.
EPA I.D. No.: WIR000107128

Dear Ms. Whitefield:

On February 25, 2014, a representative of the U. S. Environmental Protection Agency inspected Elite Coatings, Inc. (Elite Coatings) located in Green Bay, Wisconsin. The purpose of the inspection was to evaluate Elite Coatings' compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on the information provided the Elite Coatings personnel, review of records, and physical observations by the inspector, EPA finds that Elite Coatings is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of the requirements of the Wisconsin Administrative Code and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage license, Elite Coatings must be in compliance with the conditions of the Wisconsin Administrative Code s. NR 662.034(1) and (3) [40 CFR § 262.34(a) and (c)]. Specifically, we find that Elite Coatings is in noncompliance with the following conditions for the storage license exemption, and in violation of the following requirements:

1. A small quantity generator must determine whether its waste is hazardous. See, s. NR 662.011 [40 CFR § 262.11]. At the time of the inspection, Elite Coatings did not make a hazardous waste determination of the contents of the flammable storage locker near the paint mix kitchen, where the facility was storing activated paint and

other containers of obsolete or unusable products. Elite Coatings, therefore, violated the above-referenced generator requirement.

2. A small quantity generator must keep a copy of each signed manifest for three years from the date the waste was offered to the initial transporter. See, s. NR 662.193(1)(a) [40 CFR § 262.40(a)]. At the time of the inspection, Elite Coatings failed to maintain copies of two manifest records for shipments of hazardous wastes to Brenntag Great Lakes on 10/08/2013 and 12/17/2013. Elite Coatings, therefore, violated the above-referenced generator requirement.

3. A small quantity generator must keep a copy of each disposal facility signed manifest for three years from the date the waste was offered to the initial transporter. See, s. NR 662.193(1)(a) [40 CFR § 262.40(a)]. At the time of the inspection, Elite Coatings failed to maintain disposal facility signed copies of manifests 00166564GBF (08/07/2012), 001963346GBF (11/27/2012), and 001963636 (01/03/2013). Elite Coatings, therefore, violated the above-referenced generator requirement.

4. A small quantity generator must file an exception report with WDNR after 60 days of not receiving a disposal facility signed copy of the manifest document. See, s. NR 662.193(2) [40 CFR § 262.42(b)]. At the time of the inspection, Elite Coatings failed to file an exception report with WDNR after it failed to receive a disposal signed copy of the manifest 00116564GBF (08/07/2012) within 60 days. Elite Coatings, therefore, violated the above-referenced generator requirement.

5. In order to avoid the need for a hazardous waste storage permit, a small quantity generator using accumulation containers must mark each container with the accumulation start date. See, ss. NR 662.192(1)(d)(1). [40 CFR §§ 262.34(d)(4), 262.34(a)(2)]. At the time of the inspection, Elite Coatings failed to date a 55-gallon container accumulating spent solvent bottoms near ink room with the accumulation start date. Elite Coatings, therefore, failed to comply with the above-mentioned condition for a storage license exemption. However, during the inspection, Elite Coatings employee wrote the 12/30/2013 accumulation start date on the container.

6. In order to avoid the need for a hazardous waste storage permit, a small quantity generator must inspect accumulation containers and areas where containers are stored at least weekly for evidence of leakage, corrosion, or deterioration. See, ss. NR 662.192(1)(b), 665.0174 [40 CFR §§ 262.34(d)(2), 265.174)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under s. NR 664.0174 [40 CFR § 264.174]. At the time of the inspection, Elite Coatings failed to conduct weekly inspections of its hazardous waste storage area. Elite Coatings, therefore, failed to comply with the above-mentioned condition for a storage license exemption, and violated the weekly inspection requirement.

7. In order to avoid the need for a hazardous waste storage permit, a small quantity generator using satellite accumulation containers must always keep the containers closed except when it is necessary to add or remove waste. See, ss. NR 662.192(4)(a)(1) and 665.0173(1). [40 CFR §§ 262.34(c)(1)(i), 265.173(a)]. This is

also a requirement of owners and operators of hazardous waste storage facilities that use hazardous waste containers, under s.NR 664.0173(1) [40 CFR § 264.173(a)]. At the time of the inspection, two 5-gallon containers accumulating spent solvent in the facility's paint mixing kitchen were open, and waste was not being added to or removed from the containers. Elite Coatings, therefore, failed to comply with the above-mentioned condition for a storage license exemption, and violated the storage facility container closure requirement.

8. In order to avoid the need for a hazardous waste storage permit, a small quantity generator using satellite accumulation containers must mark the containers with words "Hazardous Waste" or with other words that identify the contents of the containers. See, ss. NR 662.192(4)(a)(2). [40 CFR §§ 262.34(c)(1)(ii)]. At the time of the inspection, two 5-gallon containers accumulating spent solvent in the facility's paint mixing kitchen were not labeled as "Hazardous Waste" or with other words that identified the contents of the containers. Elite Coatings, therefore, failed to comply with the above-mentioned condition for a storage license exemption.

9. In order to avoid the need for a hazardous waste storage permit, a small quantity generator must post following information next to a telephone: name and telephone number of the emergency coordinator, location of fire extinguishers, spill control material, fire alarm, and telephone number to the fire department. See, s. NR 662.192(1)(b), 665.0174 [40 CFR §§ 262.34(d)(2), 265.174]. At the time of the inspection, Elite Coatings failed to post the required information by the telephone. Elite Coatings, therefore, failed to comply with the above-mentioned condition for a storage license exemption.

10. A small quantity handler of universal waste lamps must place used fluorescent lamps in containers that structurally sound, adequate to prevent breakage, and compatible with the contents of lamps. See, WAC s. NR 673.14(4)(a) [40 CFR § 273.14(d)(1)]. At the time of the inspection, Elite Coatings failed to place used lamps in containers that were closed. Elite Coatings, therefore, violated the universal waste lamp container closure requirement. However, during the inspection, Elite Coatings employee closed all the universal waste lamp containers.

11. A small quantity handler accumulating universal waste lamps in containers must label each container with the words "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps." See, WAC s. NR 673.14(5) [40 CFR § 273.14(e)]. At the time of the inspection, Elite Coatings failed to label containers accumulating waste lamps with one of the required phrases. Elite Coatings, therefore, violated the universal waste lamp container labeling requirement.

12. A small quantity generator who accumulates hazardous waste on-site for 180 days or fewer, and who does not meet the conditions for a license exemption set forth in WAC ss. NR 662.192(1) is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, WAC ss. 670.001(3) and NR 670.010(1) and (4) [40 CFR §§ 270.1(c), and 270.10(a), (d)]. Upon failing to

comply with the conditions for a license exemption specified in paragraphs 5 through 9, above, Elite Coatings was required to obtain a hazardous waste storage license. Elite Coatings did not obtain a hazardous waste storage license, and, therefore, violated the licensing requirements of WAC ss. NR 670.001(3) and 670.010(1) and (4) [40 CFR §§ 270.1(c), and 270.10(a), (d)].

At this time, EPA is not requiring Elite Coatings to apply for a Wisconsin storage license, so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Derrick Samaranski, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Derrick Samaranski, of my staff at (312) 886-7812.

Sincerely,

Gary J. Victorine
Chief
RCRA Branch

Enclosure

cc: Jennifer Easterly, WDNR, Jennifer.Easterly@wisconsin.gov
Michael Ellenbecker, WDNR, Michael.Ellenbecker@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	Elite Coatings, Inc.
EPA ID No.:	WIR000107128
ADDRESS:	995 Waube Lane Green Bay, Wisconsin 54304
DATE OF INSPECTION:	February 25, 2014
EPA INSPECTOR:	Derrick Samaranski, LCD, RCRA, CS2

PREPARED BY: Derrick Samaranski — 04/11/14 — **Date Completed**

ACCEPTED BY: Julie Morris, Chief, Compliance Section 2 — 4/16/14 — **Date**

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI or "Inspection") of Elite Coatings, Inc. ("Elite Coatings" or "Facility") located in Green Bay, Wisconsin, on February 25, 2014. This CEI was an evaluation of Elite Coatings' compliance with hazardous waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The RCRA CEI was lead by the U.S. Environmental Protection Agency.

Participants

Inspector(s):

Derrick Samaranski, U.S. EPA

Site Representatives:

Carol Whitefield, President
Dan Dorn, Production Supervisor

Introduction

I arrived at the location of the Elite Coatings facility at 10:45 AM, and proceeded to speak with Ms. Whitefield who identified herself as the facility's president and main contact. I presented my official credentials, gave the Ms. Whitefield my business card, and explained the purpose of my visit. During the opening conference with Ms. Whitefield, I asked for a description of the Elite Coatings operations and a listing of solid and hazardous waste streams generated by the facility.

Site Description

The following information about Elite Coatings is based on the personal observations of the EPA inspector and on representations made during the Inspection by the Facility personnel identified above or is otherwise specified.

The Elite Coatings facility is a contract coatings (paints and primer) facility that coats steel, aluminum and fiberglass fabricated items. Prior to coating which is conducted in two paint booths, parts maybe shot blasted and are treated in a wash bay before being coated. Finished parts are air dried and packaged for shipment to customer.

Elite Coatings (formerly Whitefield Industrial Coatings) has operated at the current location since 2004, changing management in 2009-2011, and owner ship in 2012 because of bankruptcy filings. During December 2011 through June 2012, the facility was owned and operated by Anchor Bank. Since June 2012, the facility is operated by Elite Coatings, and leases the facility

from the Anchor Bank. Elite Coatings operates one and a half shifts from 6:00 AM to 10:00 PM, employs twenty five people, and occupies 30,000 square feet of area.

Manufacturing operations at Elite Coatings generate waste paint materials, spent solvent, aerosols, rags, spent paint filters, wastewater, used oil, and used fluorescent lamps. At the time of the inspection, the facility notified as a small quantity generator of hazardous waste.

Elite Coatings representatives stated they use process knowledge, analytical testing, and Material Data Safety Sheets (MSDS) to conduct waste determinations of its incoming waste streams.

Site Tour

The site walk-through of the facility started at 12:45 PM and began with the visit to the drying/staging area. The part drying/staging area is used interchangeably depending on the facility's space requirements. At the time of my visit to the drying/staging area, I observed coated parts that were air-drying prior to shipping, and uncoated parts staged for the pre-treatment step in the wash bay. Some of the staging operations involve tape masking and plugging openings. No hazardous waste generation was observed from the drying or the staging operations.

Next, we visited the coating pre-treatment wash bay area where Elite Coatings manually sprays pre-foam solution, acid wash, and trivalent chromium solution onto metal parts. Aluminum parts are additionally treated with de-ionized water and some of the mild steel parts are treated with a 10% phosphate solution. The last step in the pre-treatment process involves a water rinse. All the run-off from the pre-treatment bay, which is enclosed on three sides with clear plastic curtains, is collected in a 1,000-gallon sump located underneath the floor of the bay. Contents of the wash bay sump are regularly pumped to a nearby 5,000- gallon polypropylene storage tank. According to Mr. Dorn, who was asked by Ms. Whitefield to join the site-walkthrough, the wash bay sump has a level trigger, which activates a transfer pump which moves the waste water to the storage tank. No secondary containment was provided for the wastewater storage tank, which was only equipped with a high-level alarm. Mr. Dorn explained that Elite Coatings generates its own de-ionized water for the pre-treatment bay by using resin filtration, and contracts out for the maintenance of the phosphate pretreatment system. The pre-treatment chemicals used in the wash bay are stored in 55-gallon drums and 300-gallon plastic totes and are stored along the wall of the wash bay.

Next, we continued the tour of the facility operations by briefly visiting post pre-treatment part staging and prep areas located south of the wash booth. Both areas are used for getting parts ready for the coating operation. Between the part staging and prep areas Elite Coatings operates a compressor room which is the facility's only source of used oil generation. According to Mr. Dorn, Elite Coatings compressors were serviced by a contractor (Harlan) who also managed the facility's used oil. In 2014, Elite Coatings plans on servicing the compressors and managing the used oil on their own. The facility representatives stated that no used oil was being accumulated on-site at the time of my visit.

Following our visit to the staging and prep areas, we visited an enclosed area in the southwest corner of the building which was designated for the drying of large coated parts. The drying was supplemented by ceiling mounted gas powered space heaters.

East of the large part drying operation is facilities material storage space and blast shed used for treating parts prior to the coating process. Outside of the blast shed, I observed a smaller shot blast unit, which is used to process smaller parts. Both blast units use blast media that Elite coatings has tested and determined to be non-hazardous (analytical results reviewed during records review). According to Mr. Dorn, Elite Coatings employs three operators in the blast shed and generates three to four fourteen ton dumpsters per year of the spent shot blast media which is offered for disposal at a non-hazardous landfill.

Next, we continued the site walk-through of the facility by visiting one of the coating booths, which at the time of our visit was not in operation. According to Mr. Dorn, coating booths are equipped with filters to capture paint overspray and are exchanged every two to three weeks. Dry spent paint filters are managed as non-hazardous waste and thrown in the trash. All of Elite Coating's spray booths are connected to a vent system which discharges to the outside air. According to the facility representatives no control device is used prior to venting from the paint booths.

Next, we visited Elite Coating's mix room which was located north of the paint booths BI and BII. The mix room is used for preparing coatings and cleaning painting equipment. I observed three sinks, which were used for solvent part cleaning. Spent solvents were being collected in two open, unlabeled 5-gallon buckets underneath two of the three sinks. According to Mr. Dorn the collected spent solvent in the buckets is transferred to the facility's two spent solvent recovery stills for processing. Tops of the sinks were covered with flat sheets of plywood or other material to limit emission of organic vapors. According to Ms. Whitefield the mix room was not connected to the facility's outside vent system. I noted that the mix room had a strong organic vapor odor.

Outside of the mix room, I observed a fire proof locker which according to Mr. Dorn was used for the storage of containers of leftover coatings which were no longer usable. Once mixed with an activator the coatings have to be used within a specified time frame or be disposed. The coatings were being consolidated in 5-gallon pails and held to solidify prior to disposal as non-hazardous waste. I observed approximately four to six full, open, and unlabeled 5-gallon containers with coatings in various stages of solidification. In addition to containers with unusable coatings, I also observed several smaller containers, which the facility could not identify as either being waste or usable material. Again like the mix room I noted a strong organic odor. I asked Mr. Dorn if the leftover coatings were thinned with solvents, and if the facility ever conducted a waste determination on the liquid leftover coatings. Mr. Dorn stated that solid coatings are disposed in the regular trash.

Next, we briefly visited Elite Coating's metal can recycling accumulation container and paint storage room. According to Mr. Dorn Elite Coatings performs regular inventory of the paint storage room to dispose of old, unusable, or expiring products.

From the paint storage room, we visited a fireproof locker outside of the paint storage room, which is used by the facility as its hazardous waste storage area. At the time of our visit the fireproof locker held a 55-gallon drum that was accumulating still bottoms from the two solvent recovery stills. The drum was labeled as "Hazardous Waste," closed, and was dated with an accumulation start date of 12/30/13. I had a discussion with the facility representatives regarding the management of the hazardous waste drum area, as they were not clear whether the drum should have been managed as a satellite or a storage container.

Next, we visited the two spent solvent recovery stills, which were not in use at the time of my visit. I took three photographs of the recycling logs, which were hanging on the wall above the units.

The site walk-through ended with a visit to the Elite Coatings supply room where the facility was accumulating spent fluorescent bulbs in cardboard boxes. I observed that containers with the used bulbs were open, dated, and labeled as "Recyclable Bulbs." The site walk-through ended at 2:54 PM.

Records Review

For the records review I requested to see the following: hazardous waste manifest records for off-site shipments for the last three years, waste stream determinations, training records, contingency plan, and copies of the last three annual hazardous waste reports submitted to WDNR, weekly inspections of the hazardous waste accumulation area, and used oil and universal waste shipment documents.

First, I reviewed Elite Coatings' available hazardous waste manifests, which covered period from 08/07/2012 to 07/02/2013. Elite Coatings offers its hazardous waste, which includes organic solids (F003, F005) and waste paint (F005, F003, D001, D035) to Brenntag Great Lakes LLC (WID023350192) for disposal. Three hazardous waste manifests numbered 00166564GBF (08/07/12), 001963346GBF (11/27/12), and 001963636GBF (01/03/13) were missing disposal facility signed copies. Additionally Elite Coatings was missing copies of hazardous waste manifests for shipments of hazardous waste to Brenntag on 10/08/2013 and 12/17/2013. Land Disposal Restriction Forms (LDRs) were attached to most of the available manifests and covered all of the waste streams generated by Elite Coatings.

Next, I reviewed non-hazardous manifests for disposal of wash bay water to Chief Liquid Waste, Inc. (WID088878871). The manifests covered activity period from 07/09/2012 to 11/07/2013. Elite Coatings offers its wash bay water for disposal approximately once to twice a month with each shipment ranging from 3,500-5,500 gallons. Elite Coatings has an active Industrial Wastewater Discharge Permit No. 070-3 that expires on 12/31/2015. However, the facility

operates as a zero discharge facility and offers its wastewater generated from the wash bay to Chief Liquid Waste. On a regular basis, the Green Bay water district conducts inspections of the facility. I reviewed copies of 09/26/12 and 04/17/13 inspection reports.

After reviewing the bay wash water manifests and related documents, I reviewed Elite Coatings' Annual Hazardous Waste Reports that the facility filed with WDNR during the years 2014, 2013, and 2012 covering hazardous waste activities during 2013, 2012, and 2011. In 2011, Elite Coatings reported generating 24,745 pounds of hazardous waste and notified as a large quantity generator of hazardous waste. For 2012, Elite Coatings reported 2,600 pounds of hazardous waste generated and 5,200 pounds for 2013. Ms. Whitefield explained that annual hazardous waste reduction came because of spent solvent recycling activities and better inventory management. I reviewed an inventory sheet for solvent purchased by Elite Coatings from Brenntag during 2013. Elite Coatings purchases approximately three 55-gallon drums of fresh solvent per month.

Next, I reviewed a waste profile for the waste paint related solids (paint gun flushing solvent and waste paint) from Hydrite Chemical Inc. dated March 2009. The waste profile identified the waste as a characteristically ignitable D001 and listed F003 waste. I also reviewed analytical results of a sample of the spent shot blast media analyzed by Northern Lake Services Inc. Wisconsin Lab Certificate Number 721026460. The results for the spent shot blast media revealed no regulatory constituents above TCLP limits. No other waste profiles or waste determinations were available for my review.

After reviewing the waste profiles, I reviewed the facility's contingency plan and training documents for Brian Nowinski and Anthony Davis. The training certificates were issued to both employees in March 2012. No other training documents were available for my review at the time of the inspection. The Elite Coatings Contingency Plan was dated from 11/21/2011 with revisions through first part of 2012. The contingency plan identified Mr. Dorn as the primary emergency coordinator for the facility and Gordy Busick as the alternate. Ms. Whitefield explained that the contingency plan needed updating to account for changes in facility personnel. The contingency plan included: procedures for dealing with emergencies, table listing hazardous waste streams generated at the facility, evacuation map, emergency contact numbers, general facility information, and emergency equipment listing and locations. The contingency plan listed spent solvent rags and aerosol cans as being generated by Elite Coatings as hazardous waste streams. During my site walk-through of the facility, I discussed with the facility representatives management of spent rags and aerosol cans. The plan also specified training frequency for employees. After reviewing the facility's contingency plan, I explained to Ms. Whitefield that a contingency plan was not required for small quantity generators of hazardous waste, but certain emergency information needed to be posted by a telephone.

The records review ended with a review of the used universal lamps shipment document and Air Emission Inventory Summary that is used by the facility to determine its compliance with air regulations. Elite Coatings last offered its used lamps for off-site disposal on 05/13/2013 to

Lamp Recyclers Inc. No other universal waste records were available for my review. Elite Coatings does not have an air permit.

Closing Conference

For the inspection close-out conference I requested records which were not readily available at the time of my visit. I gave the facility representative Small Business Resource Sheet and Wisconsin's Solid and Hazardous Waste Education Center (SHWEC) handout. During the closeout conference, I discussed Elite Coatings' spent solvent recycling, generator status, and small vs. large quantity generator requirements with Ms. Whitefield. The inspection of the facility ended at 5:15 PM.

Attachments

A. Photographs
B. Checklists
C. List of Documents Copied/Obtained During Inspection
D. CD of All Photos Taken During the Inspection

ATTACHMENT A
Photographs

Elite Coatings, Inc.
WIR000107128

Photograph Number: 1

Photographer: Derrick Samaranski

Date and Time: 2/25/2012 2:00 PM

Photograph Description: Open and unlabeled container accumulating spent solvent under a sink in the mix room area.

Elite Coatings, Inc.
WIR000107128

Photograph Number: 2

Photographer: Derrick Samaranski

Date and Time: 2/25/2014 2:01 PM

Photograph Description: Open and unlabeled second container accumulating spent solvent under a second sink in the mix room area.

Elite Coatings, Inc.
WIR000107128

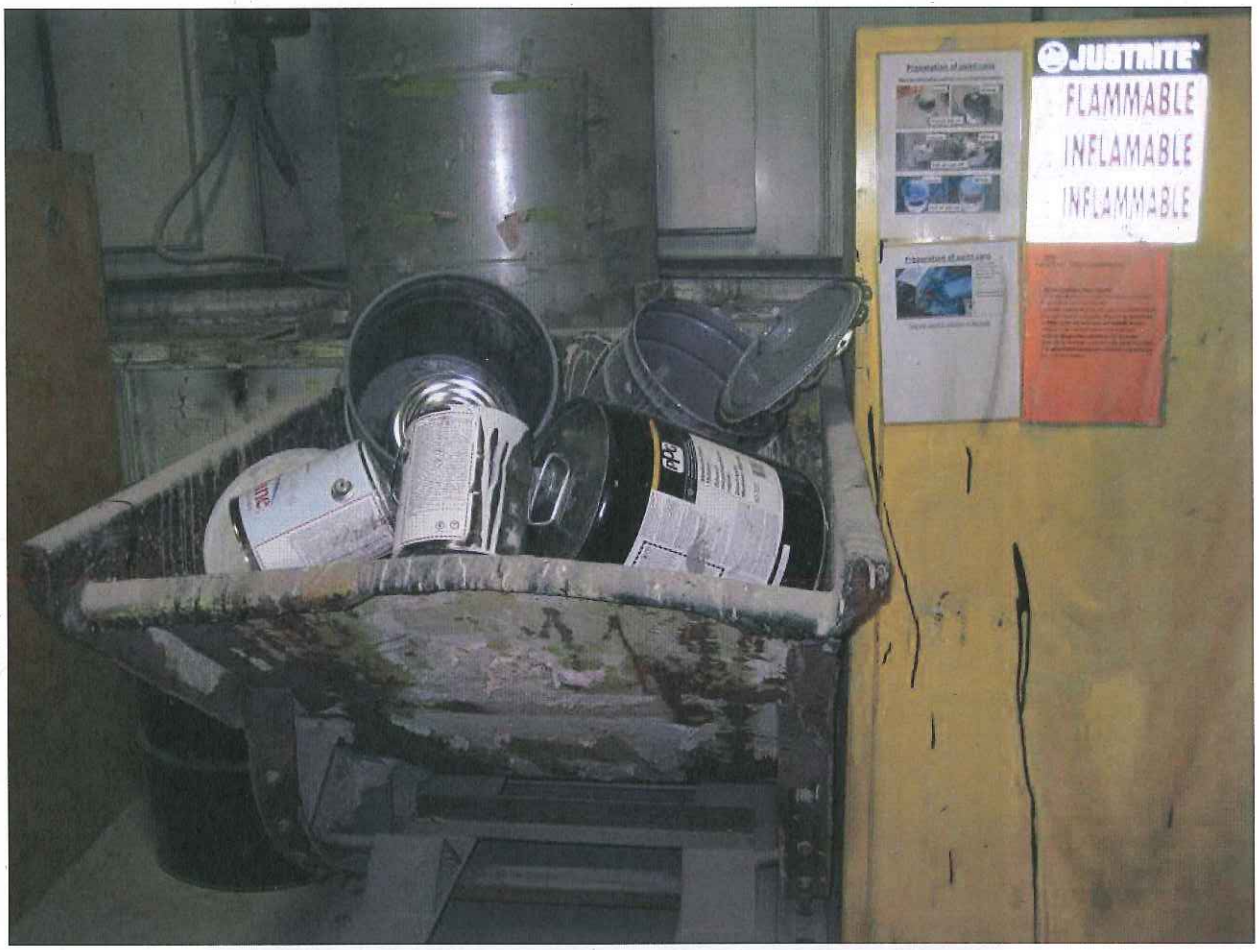
Photograph Number: 3

Photographer: Derrick Samaranski

Date and Time: 2/25/2014 2:07 PM

Photograph Description: Contents of a fireproof locker next to the mix room accumulating containers (5-gallon pails) with drying activated paint. Smaller containers of unknown disposition.

Elite Coatings, Inc.
WIR000107128



Photograph Number: 4

Photographer: Derrick Samaranski

Date and Time: 2/25/2014 2:17 PM

Photograph Description: Metal container recycling area next to the paint room.

Elite Coatings, Inc.
WIR000107128

Photograph Number: 5

Photographer: Derrick Samaranski

Date and Time: 2/25/2014 2:20 PM

Photograph Description: 180-day drum accumulating solvent recycling bottoms with missing accumulation start date located in a fireproof locker next to the paint room.

Elite Coatings, Inc.
WIR000107128

Photograph Number: 6

Photographer: Derrick Samaranski

Date and Time: 02/25/2014 2:27 PM

Photograph Description: 180-day 55-gallon drum accumulating solvent recycling bottoms dated with accumulation start date; previously pictured in photo 5.

Elite Coatings, Inc.
WIR000107128

Photograph Number: 7

Photographer: Derrick Samaranski

Date and Time: 2/25/2014 2:45 PM

Photograph Description: Open boxes accumulating spent fluorescent lamps in the supply room area.

SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS MANAGEMENT PROGRAM

This inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month , evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011).	N	662.190(2) Photo☐
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	Y	662.190(2) Photo☐
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1).	Y	662.190(2) Photo☐
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.		662.193(1)(b) Photo☐
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012). Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.190(2) Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	N	 Photo☐
B. Type of waste and frequency of shipments are specified in the contractual agreement.		662.191(1)(a) Photo☐
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer.		662.191(1)(b) Photo☐
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.		662.191(2) Photo☐
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	Y	 Photo☐
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1).	Y	662.190(2)(a) Photo☐
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR662.020(2)).	Y	662.190(2)(a) Photo☐
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	Y	662.190(2)(a) Photo☐
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	N/A	662.190(2)(a) Photo☐
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	N/A	662.192(5) Photo☐

SMALL QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.192(5) Photo ☐
L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	N	662.193(1)(a) Photo ☐
M. Copy of each manifest is kept for at least three years from the date of shipment.	N	662.193(1)(a) Photo ☐
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030).	NI	662.190.(2) Photo ☐
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031).	NI	662.190(2) Photo ☐
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)).	NI	662.190(2) Photo ☐
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)).	Y	662.190(2) Photo ☐
R. Placards are offered to the initial transporter (NR 662.033). Transporter Provided	Y	662.190(2) Photo ☐

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo ☐
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo ☐
C.A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo ☐
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1) Photo ☐
E. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	N/A	668.07(1) Photo ☐
F. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	Y	668.07(1) Photo ☐
G. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h) Photo ☐

SMALL QUANTITY GENERATOR INSPECTION

Section 3: Land Disposal Restrictions

H. Generator with a contractual agreement complies with BOTH of the following: 1. The notification and certification requirements for the initial shipment of the waste subject to the agreement. 2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.	N/A	668.07(1)(j) Photo ☐
I. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1) Photo ☐
J. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2) Photo ☐
K. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)): 1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.192(1)(d) Photo ☐

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.	Y	662.193(3) Photo ☐
B. Copy of each annual report is kept for at least 3 years from the due date of the report.	Y	662.193(1)(c) Photo ☐
C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.	N/A	662.193(2) Photo ☐

Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.192(1)(d) Photo ☐
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033).	Y	662.192(1)(d) Photo ☐
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034).	Y	662.192(1)(d) Photo ☐

SMALL QUANTITY GENERATOR INSPECTION

Section 5: Preparedness and Prevention

D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses.	Y	662.192(1)(d) Photo ☐
E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.192(1)(d) Photo ☐

Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time.	Y	662.192(1)(e)1 Photo ☐
B. ALL of the following information is posted next to the telephone: 1. Name and telephone number of the emergency coordinator. 2. Location of fire extinguishers, spill control material and, if present, fire alarm. 3. Telephone number of the fire department unless the generator has a direct alarm.	N	662.192(1)(e)2 Photo ☐
C. In the event of an emergency, the emergency coordinator takes the following actions: 1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706. 2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate. 3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil. 4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).	N/A	662.192(1)(e)4 Photo ☐
D. All employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.	Y	662.192(1)(e)3 Photo ☐

Section 7: Container Accumulation

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8.	Y	 Photo ☐
B. The accumulation start date is clearly marked and visible for inspection on each container.	N	662.192(1)(d)1 Photo ☐
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.192(1)(d)2 Photo ☐
D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	N/A	662.192(1)(b) Photo ☐

SMALL QUANTITY GENERATOR INSPECTION

Section 7: Container Accumulation

E. Containers are made or lined with materials compatible with the waste (NR 665.0172).	Y	662.192(1)(b)	Photo ☐
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.192(1)(b)	Photo ☐
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.192(1)(b)	Photo ☐
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	N	662.192(1)(b)	Photo ☐
I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.192(1)(b)	Photo ☐
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.192(1)(b)	Photo ☐
K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.192(1)(b)	Photo ☐

Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9.	Y		Photo ☐
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.192(4)(a)	Photo ☐
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.192(4)(a)	Photo ☐
D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N	662.192(4)(a)1	Photo ☐
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.192(4)(a)1	Photo ☐
F. Containers are marked "Hazardous Waste" or with other words that identify the contents.	N	662.192(4)(a)2	Photo ☐
G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171).	N/A	662.192(4)(a)1	Photo ☐
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N/A	662.192(4)(b)	Photo ☐

SMALL QUANTITY GENERATOR INSPECTION

Section 8: Satellite Accumulation

I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	N/A	662.192(4)(b) Photo ☐

Section 9: Used Oil

A. Used oil is managed on-site. If NO, go to Section 10.	N	 Photo ☐
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N	679.10(2)(a)2 Photo ☐
C. Used oil containers and tanks are in good condition and not leaking.	N	679.22(2) Photo ☐
D. Used oil containers and tanks are marked "used oil".	N	679.22(3)(a) Photo ☐
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	N	679.24 Photo ☐
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	N	 Photo ☐
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N	679.23 Photo ☐
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N	679.11 Photo ☐

Section 10: Waste Minimization Certification

A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)).	Y	662.190(2)(a) Photo ☐

Section 11: Generator Status Evaluation

A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month.	Y	662.190(1) Photo ☐
B. Waste is accumulated for 180 days or less.	Y	662.192(1) Photo ☐
C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.	N/A	662.192(2) Photo ☐

SMALL QUANTITY GENERATOR INSPECTION

Section 11: Generator Status Evaluation

D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.	Y	662.192(1)(a)
		Photo ☐
E. Describe any other activities the generator is conducting at the facility.		
		Photo ☐

- used oil generation
- universal waste lamps

UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANITY HANDLER

Revision: 03/27/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	N	673.11(1) Photo☐
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	N	673.11(2) Photo☐

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N/A	673.13 Photo☐
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N	673.13 Photo☐
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	N/A	673.13(1)(b) Photo☐
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	Y	673.13 Photo☐
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	N/A	673.13(3)(b) Photo☐
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	N/A	673.13(2) Photo☐
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	N/A	673.13(2) Photo☐
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N	673.14 Photo☐
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	N/A	673.14 Photo☐
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	Y	673.15(3) Photo☐
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.15(1) Photo☐

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown
Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANITY HANDLER

Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2) Photo ☐
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16 Photo ☐
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	NI	673.17 Photo ☐

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.18(1) Photo ☐
B. Handler that self-transports complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	N/A	673.18(2) Photo ☐
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.18(3) Photo ☐
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	Y	673.18(4) Photo ☐
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	N/A	673.18 Photo ☐
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	N/A	673.18(7) Photo ☐
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	NI	673.18(8) Photo ☐

ATTACHMENT B

ATTACHMENT C
Documents Copied

Document	Date
Copy of the Elite Coatings 2011 Contingency Plan	02/25/2014
Copy of the Site Evacuation Map	02/25/2014
Copy of the First Page of the Elite Coatings Industrial Wastewater Discharge Permit	02/25/2014
Copy of the Effluent Limits Page of the Elite Coatings Industrial Wastewater Discharge Permit	02/25/2014
Copy of the 2014 Green Bay Wastewater Pre-Treatment Compliance Report	02/25/2014
Copy of the 2011 Air Emissions Inventory Report	02/25/2014
Copies of February's Recycling Logs For Stills #1 and #2	02/25/2014
Copies of Brenntag Manifests (2012-2013)	E-mailed 02/25/2014
Copy of the 2013 Thinner Inventory	E-mailed 02/25/2014
Copy of the Waste Paint Profile	E-mailed 02/25/2014
Copies of the Chief Liquids Waste Inc. Manifests (2012-2013)	E-mailed 02/25/2014
Copies of 2012 Training Certificates for Anthony Davis and Brian Nowinski	E-mailed 02/25/2014
Copy of the Analytical Results of Shot Blast Media	E-mailed 02/25/2014
Photographs of Closed Universal Waste Lamp Containers	E-mailed 02/25/2014